

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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|------------------------------|---|------------------------|
| KNACK SYSTEMS, LLC |) | |
| |) | |
| Plaintiff/Counter-defendant, |) | |
| |) | |
| v. |) | |
| |) | Case No. 3:21-cv-07919 |
| TECH DENALI, LLC |) | |
| |) | |
| Defendant/Counter-plaintiff. |) | |

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

January 11, 2023

Re: Knack Systems, LLC v. TechDenali, LLC
Dkt. No. 21-cv-7919
Joint Letter Regarding Fact Discovery Pursuant to November 17, 2022 Letter Order

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s November 17, 2022, letter order (ECF No. 50) directing the parties to submit a joint status letter addressing the status of the parties’ completion of fact discovery.

The parties are working to resolve any remaining issues with regard to written discovery, and have begun scheduling depositions, one of which – the deposition of a representative from third-party TTI Consumer Power Tools, Inc. (“TTI”) – is scheduled to proceed today, January 11. However, we note that the deposition proceeding today was originally scheduled for November 28, 2022, and was postponed until today based on the availability of TTI’s representative. Based on the original date of this deposition and the parties’ acknowledgement that party depositions would follow, the parties requested, and the Court entered, a Scheduling Order setting modified deadlines for completing fact and expert discovery. (ECF No. 50.)

Therefore, the Parties jointly request additional time to complete discovery and propose the following modifications to the existing discovery deadlines:

- Fact discovery deadline: extended from 1/19/2023 to 3/2/2023;
- Affirmative expert reports: extended from 2/16/2023 to 3/30/2023;
- Responsive expert reports: extended from 3/19/2023 to 4/30/2023; and
Expert discovery deadline: extended from 4/17/2023 to 5/29/2023.

We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for January 12, 2023. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

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